

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

|                                  |   |                                      |
|----------------------------------|---|--------------------------------------|
| TAMMY MICHELLE FRANCHIA,         | ) |                                      |
|                                  | ) |                                      |
| Plaintiff,                       | ) | CASE NO. 2:20-cv-01244-NJK           |
|                                  | ) |                                      |
| v.                               | ) | <b>ORDER GRANTING</b>                |
|                                  | ) | <b>CONSENT MOTION</b>                |
|                                  | ) | <b>FOR EXTENSION OF TIME TO FILE</b> |
| ANDREW SAUL,                     | ) | <b>PLAINTIFF'S BRIEF</b>             |
| COMMISSIONER OF SOCIAL SECURITY, | ) |                                      |
|                                  | ) |                                      |
| Defendant.                       | ) |                                      |
|                                  | ) |                                      |

Plaintiff, Tammy Michelle Franchia, by her attorney, Hal Taylor, Esq., Of Counsel, Olinsky Law Group, hereby moves for a fifty-four day extension of time to file Plaintiff's Opening Brief. Plaintiff's opening brief is currently due to be filed February 18, 2021.

Due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met by Plaintiff's Counsel. This, combined with the large administrative record (appx. 1,400 pgs.) prevents counsel from preparing a proper and meritorious brief. Plaintiff requests this time to allow for review of the dense record and proper preparation of Plaintiff's Brief. Wherefore, Plaintiff requests an

1 extension from February 18, 2021 up to and including April 13, 2021 to file her brief. Counsel  
2 for the Plaintiff has conferred with defendant's counsel who kindly consents to this request.

3 Dated this 16th day of February, 2021.

4 Respectfully submitted,

5 /s/Hal Taylor

6 Hal Taylor, Esq.

7 Of Counsel, Olinsky Law Group

8 NV Bar No.: 4399

9 223 Marsh Ave.

10 Reno, NV 89509


11 Tel: (775) 825-2223

12 Fax: (775) 329-1113

13 HalTaylorLawyer@GBIS.com

14 IT IS SO ORDERED.

15 Dated: February 19, 2021

16   
United States Magistrate Judge